UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

NOV 20 2019

ELECTRONIC MAIL -
RETURN RECEIPT REQUESTED

Harry Adams, President
Bulk Chemicals, Inc.
1074 Stinson Drive
Reading, PA 19605

Re: Clean Air Act (CAA) 112(r) (1) and (7) Inspection of Bulk Chemicals, Inc. Facilities located in Berks County, Pennsylvania on October 1 and 2, 2019 - Post-Inspection Letter

Dear Mr. Adams:

The United States Environmental Protection Agency ("EPA") appreciates the cooperation of you and your staff related to the inspection of your Shoemakersville, [redacted] facilities ("Facilities") located at 809 Mohrsville Road, Shoemakersville (Perry Township) [redacted] Pennsylvania, respectively, on October 1 and 2, 2019. EPA's inspection was conducted to ensure compliance with Section 112(r)(1), 42 U.S.C. §7412(r)(1), also known as the General Duty Clause, of the Clean Air Act, as amended, 42 U.S.C. §§7401 et seq. ("CAA"). Part of the overall goal of EPA Region III's Chemical Accident Prevention Program is to promote accident prevention and chemical awareness at facilities handling hazardous substances.

The purpose of this letter is twofold. First, EPA is writing to inform you that, during the General Duty Clause portion of the inspection, EPA observed the Facility's chemical storage and manufacturing processes and has determined that the following practices at the Facility are potentially not in compliance with the General Duty Clause because the practices are not at least as protective as standard industry practices:

1) Incompatible chemicals were noted to be stored less than 20 feet from each other in each of the three warehouses. [NFPA 400-2013, Section 6.1.12] [redacted] NFPA 30-2015, Section 9.17.3]
2) [redacted] [NFPA 30-2015, Section 12.3.10]
3) Hydrogen Peroxide was noted to be stored in 55-gallon drums on wooden pallets at the Shoemakersville [redacted] facilities. [NFPA 400, Section 15.2.12.2]

EPA expects you to expeditiously correct the above-listed deficiencies in order to bring the owner or operator into compliance with the CAA Section 112(r) by ensuring that processes are at least as protective as standard industry practices. Within thirty (30) calendar days of receipt of this letter, please submit a written notification to EPA describing the specific action(s), if any, taken by the owner or operator since the inspection, including but not limited to, photo documentation, invoices, etc. EPA reserves the right to take an action to enforce the owner or operator's obligation to comply with the General Duty Clause.

Note that the lower warehouse at Shoemakersville will need to meet the latest NFPA 400, NFPA 30 and/or other applicable codes or standards for the storage and manufacturing of oxidizers, corrosives, toxics, highly toxics and flammables.

Non-responsive based on revised scope.

EPA is currently evaluating its options to address the aforementioned areas of concern.

The second purpose of this letter is to inform you that the EPA has recommendations to improve the safety of the Facility's chemical storage and manufacturing processes. These recommendations, considered "good engineering practices" by Region III, are listed below.

1. Install spill control/drainage, secondary containment, ventilation, fire protection and other requirements of the latest editions of NFPA 30, 400 and/or other applicable codes or standards at the Shoemakersville (upper warehouse), Non-responsive based on revised scope. Non-responsive based on revised scope. facilities.
2. Prepare an electrical classification drawing or description for the flammable/combustible storage area(s) at applicable facilities in accordance with NFPA 30-2015.

Bulk Chemicals, Inc. ("BCI") is not required to implement these "good engineering practices" and EPA would not pursue an action for BCI's decision not to implement all or some of the recommendations above. However, EPA encourages BCI to implement the recommendations, as doing so will help BCI meet the goals of the risk management program, *i.e.*, to prevent accidental releases of chemicals that could cause serious harm to human health or the environment and reduce the severity of releases that may occur. Please contact Mr. Welsh if you would like to discuss the rationale for or implementation of any of the above recommendations. Further, as a courtesy, please advise us, in writing, within thirty (30) calendar days, whether BCI will be implementing the listed recommendations.

This letter does not constitute a waiver, suspension or modification of the requirements of, including but not limited to, Section 112(r) of the Clean Air Act, 42 U.S.C. §7412(r), or any regulations promulgated or enforcement authority thereunder. Further, nothing herein shall be construed to limit the authority of EPA to undertake action against any person, including Bulk Chemicals, Inc., in response to any condition which EPA determines may present a hazard, or an imminent and substantial endangerment to the public health, public welfare or the environment.

Should you have any questions, please contact Michael Welsh at (215) 814-3285. All correspondence should be sent to the attention of Michael Welsh at the following address: USEPA, 1650 Arch Street (3ED12), Philadelphia, PA 19103.

Sincerely,

Renee Bryant

Renee Bryant, Acting Section Chief
Oil and Prevention Enforcement Section
Enforcement and Compliance Assurance Division

cc: OSHA
PEMA
Berks County DES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Inspection Report: Bulk Chemical Inspection (20-PA-GDC-017, 018 & 019)

Facility Addresses:
809 Mohrsville Road, Shoemakersville, PA
Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.

Facility RMP ID: NA
NAICS/SIC Code: 325998 / 2899
Date of Inspection: 10/1-2/19
Process Construction: 1974 (Shoemakersville)

Reason for Inspection: Chemical release & fire on or about June 9, 2019, incompatible storage of chemicals in warehouses.

RMP Information: The three (3) above facilities do not appear to fall under the RMP regulations.

Process that was evaluated during the inspection: Chemical manufacturing and/or storage.

Name of EPA Inspectors:
Michael Welsh, US EPA, RMP Coordinator, (215) 814-3285, welsh.mike@epa.gov
Mary Hunt, US EPA, RMP Coordinator, (215) 814-3425, hunt.mary@epa.gov
Patrick Beckley, US EPA, RMP Inspector, (215) 814-3261, beckley.patrick@epa.gov

List of all parties (including name, title, telephone number, and email address) present during any portion of the inspection:
Harry Adams, President, Bulk Chemicals, Inc. (BCI), President, (410) 336-5836, hadams@bulkchemicals.us;
Frank Ike, Director of Operations, BCI, (b) (6) ke@bulkchemicals.us;
Michael Rawley, EHS Coordinator, BC michael.rawley@bulkchemicals.us;
Megan Young-Kraft, Berks County Department of Emergency Services, Emergency Planner/SARA Coordinator, (610) 374-4800 X8211, myoung-kraft@countyofberks.com

Lead Inspector Michael Welsh	Michael Welsh Signature	11/14/19 Date
Secondary Inspector Mary Hunt	Mary Q Hunt Signature	11/14/19 Date
Secondary Inspector Patrick Beckley	M. Welsh FOR P. BECKLEY Signature	11/14/19 Date
Supervisor Renee Bryant	Renee Bryant Signature	11/20/19 Date

Summary of opening conference with facility representatives: Credentials were presented and consent to access provided to and signed by Mr. Adams at approximately 9:40 AM. I explained to Mr. Adams and other BCI personnel that we were conducting a General Duty Clause (GDC) inspection that would include a documentation review and field inspection. CBI was discussed at this time. Facility personnel later chose to have select documents collected during the inspection considered as CBI and the inspection photographs considered CBI (list of chemicals?).

Company and incident history: Company started in April 1974 by manufacturing metal finishers, cleaners and coatings at the 809 Mohrsville Avenue facility with a Shoemakersville mailing address. The upper warehouse at Shoemakersville was built in 1980-1981. In October 2018 the Blandon facility began operations. On 5/31/19 a delivery of 3,850 gallons of 67% Nitric Acid was delivered to the Mohrsville Ave. facility into a 45,000 gallon stainless steel tank in the lower warehouse (LWH). A gasket was previously replaced on the tank with an incompatible one and a leak developed on 6/8/19 which leaked outside the building onto Mohrsville Avenue which was noticed by a fire chief on 6/9/19 driving past the facility. Berks & Lehigh County officials responded as well as cleanup contractors (Sioux Environmental for exterior cleanup, First Call/Lewis for interior cleanup). A fire started on 6/10/19 near a transformer in the SE corner of the LWH as contractors put down soda ash to neutralize the spilled nitric acid (possible reaction with transformer wiring). A total of 1,850 gallons of nitric acid was estimated to be released during the spill. EPA Superfund personnel were requested by the county after the fire to oversee the cleanup operation for several weeks. Products were transferred to totes from tanks to empty the LWH out for cleanup; most product was stored in the upper warehouse. Two tanks were removed from the LWH nitric acid tank (67%) and the sulfuric acid tank (50%). The Hamburg facility was utilized after the spill to store products due to the loss of use of the lower warehouse.

GDC evaluation:

1) Hazards Identification: Facility personnel claimed that their chemists evaluated the hazards of the chemicals stored at the facility.
2) Design and maintain a safe facility: Facility personnel provided MSDSs or SDSs for chemicals stored at their warehouses which consist of CMU block and steel panels. They did not know the fire/safety codes or standards that pertain to their facilities. The following items were requested: SOPs, product inventory, electrical classification drawings/description, ventilation system design information, training records. Sixteen people work two shifts as blenders, forklift operators, quality assurance, EH&S and administrative. Four tanks were inspected daily and electricity shut off nightly. Workers initially get orientation training; training records were requested but Mr. Adams stated that the records were burned in the fire. They said moving forward that Velocity EHS program would be used to document employee training.
3) Minimize consequences of accidental release: The company has submitted Tier IIs for the Blandon and Shoemakersville facilities; emergency response plans have also been prepared and submitted. Facility personnel respond to small fires only. During the acid spill, homes were evacuated within a half mile radius and a quarter mile radius for the subsequent fire.

Summary of any employee interviews that were conducted during the inspection: None conducted.

Summary of field inspection: EPA inspectors arrived at the Shoemakersville facility at approximately 9:30am. Credentials were shown to Mr. Adams who next granted access for the inspection of their 3 facilities by signature of the access agreement. CBI issues were discussed. EPA inspectors and BCI representatives (BCIREPS) then toured the lower warehouse (LWH) where the spill and fire had occurred in early June. Tanks in the LWH were empty per BCIREPS and the concrete slab had been removed in areas for cleanup of acid which had leaked into cracks and under the slab.

The inspection team then proceeded to the upper warehouse (UWH). Totes of oxidizers, acids and bases were noted to be stored on the west side of the UWH while drums of other chemicals were stored on the east side. Drums of Non-responsive based on revised scope. were noted to be stored on a wooden pallet (Area of Concern or AOC). Nitric Acid in metal totes were noted to be stored adjacent to a pallet of combustible office files in storage containers and approximately 18.5 feet from a tote of Potassium Hydroxide 45% (KOH) (AOC). Totes of other acids (Phosphoric, Sulfuric, Chromic) and combustibles (Glycol Ether EB) were noted to be stored < 20 feet from bases (KOH 45%, NaOH 50%, Ammonium Hydroxide) (AOC).

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OXIDIZER ANALYSIS (NFPA 400-2013)

Upper Warehouse (Constructed in 1980-1981)
809 Mohrsville Road, Shoemakersville, PA
Operations beginning 1974

Observations

Class 1 Oxidizers
Sodium Nitrite (Row 1): stored in bags = 2280#.

Class 2 Oxidizers
Nitric Acid 67% (Row 4): stored in 350-gallon totes but only filled to 330 gallons each, 3 totes filled/partially filled = 11,414 pounds. One leaking tote was noted to be in containment. Empty totes were noted to be stored on top. Height of single tote ~ 45". Adjacent to files stored in plastic totes (combustible materials) on one side and other side Chromic acid and sulfuric acid. Glycol Ether (combustible) was located in Location #11, approximately 10 feet away from the Nitric Acid 42 BE in space #10. No spill control IAW 15.2.1 and 6.2.1.9.2 (for individual container >55 gallon).

Chromic Acid 40% (Row 5): stored in 275-gallon totes 3 totes filled/partially filled = 7350#. Tote on top of tote, total 90" in height. Adjacent to sulfuric acid 50% (liq) totes (5975#). 3 rows away from glycol ether (combustible liquid), 2 rows away from totes with paper.

Non-responsive based on revised scope.

Non-responsive based on revised s[redacted]Stored adjacent to Sodium Nitrite (solid Oxidizer class 1) and approximately 5' from combustible materials (files).

Class 3
Sodium Bromate solid (Row 1): stored in bags, 177#.
Ammonium Dichromate (Row 1): drum 125#, both are approximately 5' from combustible materials (files).

Areas of Concern
For Class 1, 2, and 3 oxidizers at the Mohrsville building, NFPA 400 was reviewed. Since the building was constructed in 1980/1981 the non-compliance issue would be that combustible materials and incompatible substances are stored less than 20 feet from the Class 1, 2, and 3 oxidizers. Additionally, per NFPA 30-2015, distance from oxidizers to flammable or combustibles shall be > 25 feet.

Recommendations
It would be recommended the BCI comply with the latest standards for oxidizers – NFPA 400, chapter 5, 6, and 15. These recommendations would include, but not be limited to, meeting all requirements of section 5.2.1.13.2 and Table 5.2.1.13.3(a). Requirements for increased MAQ includes smaller container sizes, 4' aisles on 3 sides, 20 ft from incompatibles, storage height

<6', etc. If individual containers are to remain greater than 10 gallons, storage area for oxidizers needs to meet the requirements for Protection Level 3, see NFPA 400 Section 6.2 which requires automatic fire sprinkler system.

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Observations

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Recommendations

Non-responsive based on revised scope.
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TOXIC/CORROSIVE ANALYSIS (NFPA 400-2013)

Toxics (LD50 of 50-500 mg/kg):
Ammonium BiFluoride
Ammonium Fluoride

Highly Toxic (LD50 < 50 mg/kg):
Hydrofluoric Acid
Chromic Acid

Other toxics list from facility: Methanol, EPML 577, SDS-Bulk Bond 315, 322, 1423, NP 250, NP 275, SDS-Bulk Rinse 1

Extremely hazardous substance (EHS) under GDC (lbs)	Shoe-makers-ville	Non-responsive based on revised scope.	Toxic MAQ/CA (lbs)	Corr MAQ/CA (lbs)
Non-responsive based on revised scope.	Not Listed (NL)	Non-responsive based on revised scope.	10	500
Chromic Acid 40% Highly Toxic EHS (LD50<50mg/kg) (corrosive)	7,350	Non-responsive based on revised scope.	10	500
Ammonium Bifluoride Toxic EHS (solid) (LD50 50-500mg/kg) (corrosive)	1,264	Non-responsive based on revised scope.	500	5000
Toxic EHSs (on SDSs) Toxicity not listed or is low				
Methanol (Flam IB) (toxic if inhaled)	116	Non-responsive based on revised scope.	500 lbs?	
Non-responsive based on revised scope.	NL	Non-responsive based on revised scope.		

SDS-Bulk Bond 315 (skin contact) (corrosive)	665	Non-responsive based on revised scope. Non-responsive based on revised scope. Non-responsive based on revised scope. Non-responsive based on revised scope. Non-responsive based on revised scope. Non-responsive based on revised scope.		500
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				500
				500

All facilities are over the MAQs for corrosives and toxics/highly toxics (Ref: NFPA 400-2013, Chapter 5). Facilities were built at various times with various codes & standards.

FLAMMABLE SUBSTANCE ANALYSIS (NFPA 30-2015 Edition)

Flammables (from BCI SDSs sent via email):

D-Limonene, FP=43C, Class II flammable
Ethyl Alcohol, FP=27C, BP=81C, Class II flammable
Heptane, FP=-4C, BP=98C, Class 1B
Isopropyl Alcohol, FP=54, Class II
Methanol, FP=11, BP=65, Class 1B
CDA Ethanol (190 proof), FP=67F, BP=174, Class 1B
SDS-Blackfast 833, FP=70C, Class IIIA
SDS-Bulk Rinse Aid3, FP=29C, BP=85, Class 1C
SDS-Bulk RP 1200, FP=40, Class II
SDS-Bulk Sol27, FP=46, Class II
SDS-Bulk Strip 865, FP=51, Class II

Storage of Liquids in Containers, Storage Occupancies
Chapter 12, NFPA 30, 2015 Edition
Table 12.6.2.2-Qty Limitations for Unprotected Liquid Warehouses

Extremely hazardous substance (EHS) under GDC (Flammables)	Shoe-makers-ville <660	[redacted]	[redacted]	Class,max qty/pile,max height	Flam Max total
Methanol (Flam IB) (toxic if inhaled) Drum storage	116			IB,1375,5	1375
[redacted]				II,4125,7	8250
[redacted]				IC,2750,7	2750
[redacted]				IB,1375,5	1375
[redacted]				IB,1375,5	1375
[redacted]				IIIA, 13750,15	27500
[redacted]				II,4125,7	8250
[redacted]				IC,2750,7	2750
[redacted]				II,4125,7	8250

Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.

General Observations at Facilities

Warehouses at the Shoemakersville facility were built in 1950 (lower warehouse) and 1980-81 (upper warehouse). Non-responsive based on revised scope. The three facilities must meet the administrative, operational and maintenance provisions of the latest edition of NFPA 400. [NFPA 400-2013, Section 1.3]

Spacing between aisles appeared to meet the 8-feet requirement between aisles for unprotected storage in all buildings. [NFPA 30, 12.3.8]

Non-responsive based on revised scope.

Non-responsive based on revised scope.
Non-responsive based on revised scope.

*Glycol Ether EB, a combustible liquid (Class IIB), was noted to be stored in totes < 25 feet from totes of Nitric Acid, an oxidizer, at the Shoemakersville UWH. [NFPA 30-2015]

*Phosphoric and Nitric Acid in totes was noted to be stored < 20 feet from totes of Potassium Hydroxide, a base, at the Shoemakersville UWH.

Ventilation and heating were observed in the UWH; no fire protection or spill containment was noted.

Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.

*Hydrogen Peroxide was noted to be stored in 55-gallon drums on wooden pallets at the Shoemakersville facilities. [NFPA 400, Section 15.2.12.2]

*Incompatibles were noted to be stored < 20 or 25 feet from each other in each of the three (3) WHs (see field notes) in violation of NFPA 400-2013, Section 6.1.12 or NFPA 30-2015, Section 9.17.3. NFPA 30-2015 requires a minimum 25 feet separation of flammables or combustibles from oxidizers.

Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.
Non-responsive based on revised scope.

Non-responsive based on revised scope.

Emergency Action Plans provided to EPA appear to meet the minimum requirements of NFPA 30, Section 6.8.

All chemicals at the lower warehouse at the Shoemakersville facility were removed from the building after the fire per facility personnel.

Areas of Concern

Non-responsive based on revised scope.Non-responsive based on revised scope.
Non-responsive based on revised scope. fire protection did not appear to be installed at any of the facilities. Non-responsive based on revised scope.
Non-responsive based on revised scope.Non-responsive based on revised scope.
Non-responsive based on revised scope. Note that the LWH at Shoemakersville may need to meet these requirements when it is rebuilt after the previous spill and subsequent fire. (See previous pages for oxidizer comments)

Recommendations

Prepare electrical classification drawing or description for the flammable/combustible storage area(s).

(See previous recommendations for oxidizer comments)

Appendices

- Appendix A: List of Documents Collected During Inspection
- Appendix B: List of Photographs Taken During Inspection
- Appendix C: Scanned Copy of GDC/RMP Inspection Sign-In Sheet

Appendix A: List of Documents Collected During Inspection

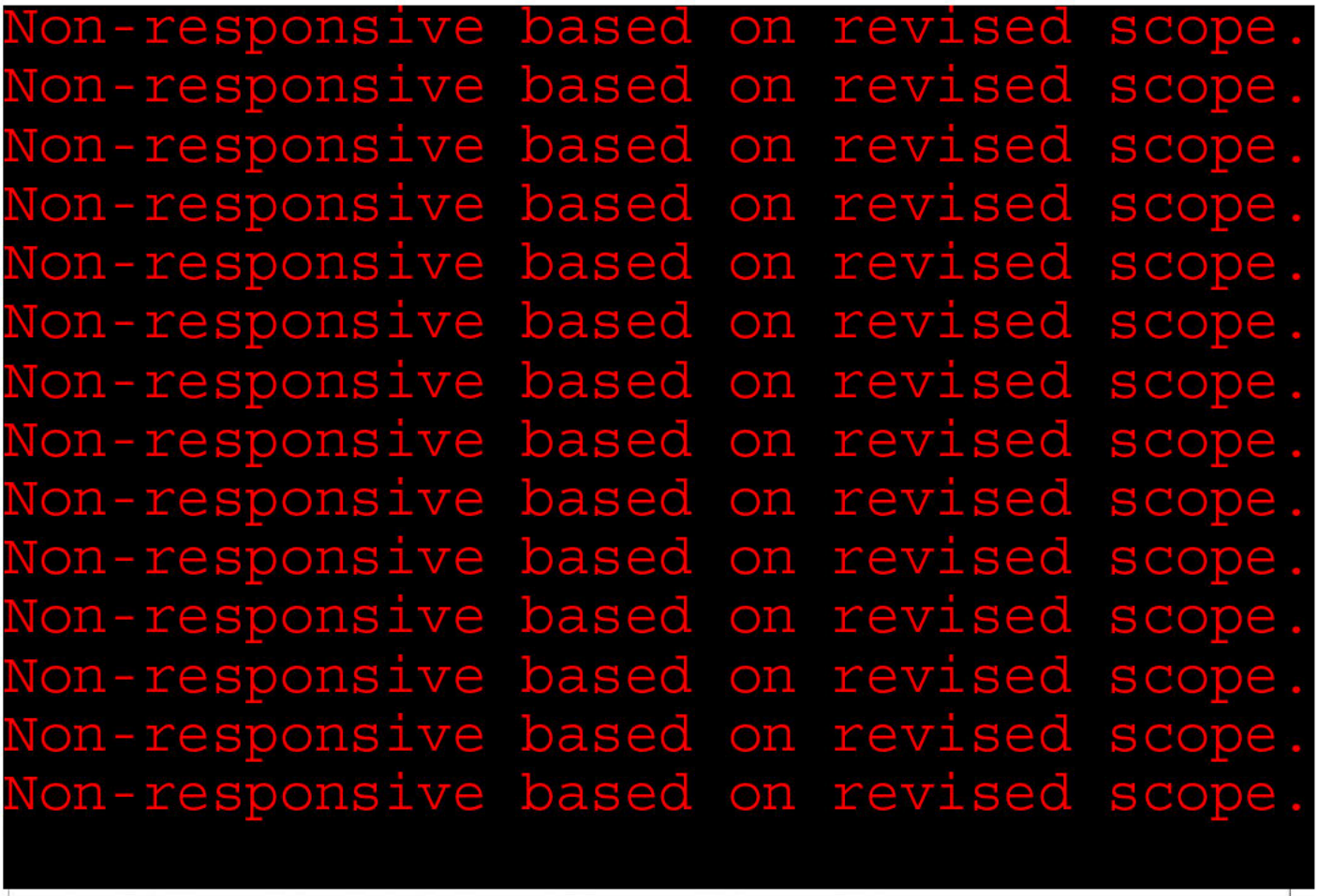
No.	CBI?	Document Description
1	Yes	Warehouse Inventory
2	Yes	Warehouse Floor Plan
3	Yes	SOPs
4	Yes	Emergency Action Plan
5	Yes	Chemical Layout for [redacted] facilities
6	Yes	Emails from BCI personnel

Appendix B: List of Photographs Taken During Inspection

Photograph Log for Bulk Chemicals, Inc. on October 1 and 2, 2019; Claimed CBI?: YES	
Number	Description
Shoemaker Facility	
Bulk Chemicals Inc (01)	North (N) end of lower warehouse (LWH) looking West (W)
Bulk Chemicals Inc (02)	South (S) end of LWH looking SW
Bulk Chemicals Inc (03)	Inside LWH looking S
Bulk Chemicals Inc (04)	Inside LWH looking SE at tank pad
Bulk Chemicals Inc (05)	Inside LWH looking East (E) at blending tanks
Bulk Chemicals Inc (06)	Inside LWH looking NE at blending tanks
Bulk Chemicals Inc (07)	Inside LWH looking SW at blending tank
Bulk Chemicals Inc (08)	Inside LWH looking W at blending tanks
Bulk Chemicals Inc (09)	Inside LWH looking NW at blending tanks, Methanol drum on platform
Bulk Chemicals Inc (10)	Inside LWH looking N at interior wall with offices behind
Bulk Chemicals Inc (11)	Inside LWH looking S, up at ceiling
Bulk Chemicals Inc (12)	Inside LWH looking N, up at ceiling
Bulk Chemicals Inc (13)	Upper warehouse (UWH) storage of oxidizers near north end looking W; H2O2 on wooden pallets
Bulk Chemicals Inc (14)	UWH storage of oxidizers; H2O2 on wooden pallets
Bulk Chemicals Inc (15)	UWH storage of oxidizers; Ammonium Dichromate
Bulk Chemicals Inc (16)	UWH storage of oxidizers; Sodium Bromate
Bulk Chemicals Inc (17)	UWH looking W at [redacted] & nitrite (50 lb. bags)
Bulk Chemicals Inc (18)	UWH looking W at paper file containers in black & yellow containers
Bulk Chemicals Inc (19)	UWH looking W at paper file containers on right and nitric acid totes (350 gallon 67%)
Bulk Chemicals Inc (20)	UWH looking W at nitric acid totes, phosphoric acid totes on left (S)
Bulk Chemicals Inc (21)	UWH looking W at nitric & phosphoric acid totes
Bulk Chemicals Inc (22)	UWH looking W at glycol ether EB totes S of phosphoric acid totes
Bulk Chemicals Inc (23)	UWH looking W at Potassium hydroxide 47% totes on right, Ammonium hydroxide on left
Bulk Chemicals Inc (24)	UWH looking W at Hazardous waste tote left (S) picture #23
Bulk Chemicals Inc (25)	UWH looking W at Chromic Acid 40% tote
Bulk Chemicals Inc (26)	UWH looking NE at east wall shelving
Bulk Chemicals Inc (27)	UWH looking ESE at SE corner of building
Bulk Chemicals Inc (28)	UWH looking SW at ceiling, fan on S end of building

Bulk Chemicals Inc (29)	UWH looking NW at NW corner, ceiling of building
Bulk Chemicals Inc (30)	Looking E at UWH exterior entrance into building

Non-responsive based on revised scope.



Photographer: Michael Welsh

2.1 GDC/RMP Inspection Sign-In Sheet

GDC/RMP INSPECTION SIGN-IN SHEET			Inspection Date:	October 1 and 2, 2019		
FACILITY NAME & CASE NUMBER	Bulk Chemicals, Inc. 809 Mohrsville Road, Shoemakersville (Perry Township) 1076 Park Road, Blandon (Maidencreek Township) 72 Feick Avenue, Hamburg (Upper Bern Township)			20-PA-GDC-017 20-PA-GDC-018 20-PA-GDC-019		
NAME	ORGANIZATION	TITLE	PHONE NUMBER	EMAIL ADDRESS	ATTENDED OPENING CONFERENCE	ATTTENDED CLOSING CONFERENCE
Michael Welsh	USEPA	RMP Coordinator	(215) 814-3285	welsh.mike@epa.gov	☐	☐
Mary Hunt	USEPA	RMP Inspector	(215) 814-3425	hunt.mary@epa.gov	☐	☐
Patrick Beckley	USEPA	RMP Inspector	(215) 814-3261	beckley.patrick@epa.gov	☐	☐
Frank Ihle	BCI	Dir of Operations	[redacted]	fihle@bulkchemicals.us	☐	☐
Michael Rawley	BCI	EHS Coordinator		Michael.Rawley@bulkchemicals.us	☐	☐
Harry F. Adams	BCI	President		hadams@bulkchemicals.us	☐	☐
Megan Young-Kraft	Berks Co DES	SARA Planner		MYoung-Kraft@countyofberks.com	☐	☐
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